

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

<b>IN RE:</b>	)	
	)	
<b>Green Copper Holdings, LLC</b>	)	<b>Case No. 25-10088-T</b>
<b>EIN No. xx-xxx9708</b>	)	<b>Chapter 7</b>
	)	
<b>Copper Tree, Inc.</b>	)	<b>Substantively Consolidated</b>
<b>EIN No. xx-xxx6608</b>	)	
	)	
<b>The Inn at Price Tower, Inc.</b>	)	
<b>Debtors.</b>	)	

**CLAIMANT PRICE TOWER ART CENTER (PTAC) RESPONSE AND OBJECTION  
TO RELIEF REQUESTED BY PICTORIA STUDIOS USA, INC. AND TAKTIK  
ENTERPRISES, INC. (Dkt. 255)**

Claimant Price Tower Art Center, Inc. (“PTAC”) submits this response and objection to Pictoria Studios and Taktika Enterprises (“Objecting Parties”) Objection to Claim No. 17 (Dkt. 255). In support of PTAC’s Claim No. 17 and as an objection to the Objecting Parties’ requested relief, PTAC states as follows:

1. PTAC’s Proof of Claim No. 17 in the amount of \$163,000 includes the same \$163,000.00 that is being sought by Mark Haskell (“Haskell”) (Claim No 21-2) for repayment of amounts paid to release a lien to the benefit of Debtor. PTAC’s duplicate claim (Claim No. 17) is being submitted to ensure the \$163,000.00 COVID-19 Economic Injury Disaster Loan (“EIDL”) claim is preserved in the event the trustee or the Court concludes that the claim is more properly PTAC’s. PTAC and Haskell only seek one recovery, a total of \$163,000.00. The EIDL was subject to a UCC lien in favor of the U.S. Small Business Administration which burdened the assets at the time of the sale to Debtor. Haskell advanced funds that were utilized to pay the lien and benefited the Debtor’s estate. Haskell’s payments constitute a valid general unsecured claim against this estate.

2. PTAC's contribution to the Debtor and entitlement to recovery are established by the document filed in support of Claim No. 17 and will be further supported by testimony at a hearing on the objection.
3. PTAC denies the Objecting Parties remaining allegations.
4. On August 18, 2025, the Trustee filed his Motion to Settle Proofs of Claim 21-2, 22-2, and 23-2 (Dkt. 265) which may impact the resolution of this Claim No. 17.

Wherefore, PTAC requests that this Court enter an Order:

- a. Approving PTAC's Proof of Claim 17 as filed or in such amount as may be agreed to by PTAC and the Trustee, and approved by the Court.
- b. Alternatively, set a hearing to address the Objecting Parties' objection (Dkt. 255).
- c. Awarding PTAC's attorney's fees and cost against the Objecting Parties.

Respectfully submitted,

/s/ Kevin P. Doyle  
Kevin P. Doyle, OBA No. 13269  
Maxfield J. Malone, OBA No. 34598  
PRAY WALKER, P.C.  
21 N. Greenwood Ave., Suite 400  
Tulsa, OK 74120-1904  
Tel: (918) 581-5500  
Fax: (918) 581-5599  
kdoyle@praywalker.com  
mmalone@praywalker.com

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on September 17, 2025, a true and correct copy of the foregoing pleading was served electronically on participants in the CM/ECF system according to local procedures.

/s/ Kevin P. Doyle